

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants,

TRUE THE VOTE,

Movant-Intervenor.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

**UNOPPOSED MOTION TO ENTER CONSENT PROTECTIVE ORDER**

The United States respectfully requests that the Court enter the accompanying Consent Protective Order. This protective order specifies the conditions under which private, sensitive, or legally confidential documents and information in possession of the parties must be exchanged, used, and protected in this litigation, and authorizes the parties to disclose that information in response to discovery requests. This protective order is justified by Rule 26(c) of the Federal Rules of Civil Procedure and relevant case law and is necessary in order for the Parties to obtain relevant and essential discovery. Prompt entry of this order authorizing the parties to disclose such records is necessary for the conduct of discovery in this action. The United States, therefore, respectfully requests that the attached Consent Protective Order be adopted and ordered by the Court.

Date: December 3, 2013

KENNETH MAGIDSON  
United States Attorney  
Southern District of Texas

Respectfully submitted,

JOCELYN SAMUELS  
Acting Assistant Attorney General  
Civil Rights Division

/s/ Daniel J. Freeman

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2013, I served a true and correct copy of the foregoing via the Court's ECF system on the following counsel of record:

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